

REMARKS/ARGUMENTS

STATUS OF CLAIMS

Applicants have amended Claims 1 and 13. Applicants have cancelled Claims 7 and 8, and, thus, the rejections of Claims 7 and 8 are moot. Applicants have added new Claims 15 and 16. Applicants respectfully request reconsideration of pending Claims 1-5, 9-11, 13, and 15-16 in light of the following remarks.

OBJECTIONS TO THE CLAIMS

Claims 7, 8 and 13 stand objected to as result of depending from cancelled Claim 6. Applicants have cancelled Claims 7 and 8, and, as amended, Claim 13 depends from Claim 1. Accordingly, Applicants submit these objections have been rendered moot.

CLAIM REJECTIONS - 35 U.S.C. § 112

Claims 1-5 and 9-11 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully maintain that the claims as previously presented were fully supported by the original specification and, as such, in conformance with 35 U.S.C. § 112, first paragraph. However, to expedite prosecution of this application, Applicants have amended Claim 1.

Amended Claim 1 calls for a retainer ring member and recites “wherein the retainer ring member includes three individual arced elements, each of the arced elements having at least one end linked to an end of another of the arced elements, the arced elements being movable relative to each other to facilitate insertion of the retainer ring member into the pressure vessel.”

Applicants respectfully submit that all of these claimed features are disclosed in the original specification and drawings, in particular Figs. 5A and 5B. In Fig. 5A, a retainer ring 100 is illustrated and described as having three elements 105A, 105B, and 105C. Moreover, the specification - from page 6, line 24 to page 7, line 2 – states as follows: “The retainer ring 100 is made of at least two arced elements that are movable relative to each other and thereby

facilitate its insertion for use. The elements may be provided with sufficient structure to enable their interlocking.” In response to the Examiner’s statements on page 6 of the Office Action, Applicants respectfully submit that the small circles drawn on the links between the arced elements can only represent a moveable connection, particularly a rotatable connection. First, the small circles cannot represent a fixed pin in a pin/slot configuration because no slots are shown in Fig. 5A. Second, the small circles cannot represent a fixed connection with no movement, because in that case two small circles representing two fixed pin connections would need to be shown on each link (*i.e.*, one circle on each side of each link for a total of four circles in Fig. 5A). Applicants respectfully submit that the two small circles on two links shown in Fig. 5A, along with the statement in the specification that the arced elements are movable relative to each other, would reasonably convey to even a worker of low skill that the arced elements rotate with respect to each other.

Accordingly, for at least these reasons, Applicants submit that Claim 1 is in conformance with 35 U.S.C. § 112, first paragraph. Applicants respectfully request withdrawal of these rejections.

CLAIM REJECTIONS - 35 U.S.C. § 102

Claims 1, 4, 5, 10, and 11 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,720,411 issued to Darby et al. (hereinafter “Darby”).

Amended Claim 1 calls for a retainer ring member and recites “wherein the retainer ring member includes three individual arced elements, each of the arced elements having at least one end linked to an end of another of the arced elements, the arced elements being movable relative to each other to facilitate insertion of the retainer ring member into the pressure vessel.”

On page 6 of the Office Action, the Examiner acknowledges that Darby only discloses a “one-piece” coiled retaining ring that does not have three individual elements. As a result, Applicants respectfully submit that Darby does not anticipate amended Claim 1 because Darby does not disclose “wherein the retainer ring member includes three individual arced elements, each of the arced elements having at least one end linked to an end of another of the arced

elements, the arced elements being movable relative to each other to facilitate insertion of the retainer ring member into the pressure vessel,” as specified by amended Claim 1. Claims 4, 5, 10 and 11 depend from Claim 1 and, therefore, for at least the same reasons stated above with respect to Claim 1, are allowable. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 1, 4, 5, and 9-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby, over Darby in view of U.S. Patent No. 2,401,856 issued to Brock (hereinafter “Brock”), and over Darby in view of U.S. Patent No. 3,136,230 issued to Buckley (hereinafter “Buckley”). Claims 2 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Darby, Darby in view of Brock, or Darby in view of Buckley in view of U.S. Patent No. 3,447,712 issued to Galasso et al. (hereinafter “Galasso”).

As discussed above, Darby does not teach or suggest three individual arced elements. Applicants submit that Brock does not cure the deficiencies of Darby. Brock teaches several embodiments of a retaining member 10 including a central portion 11 from which extend radial spoke portions 12, each terminating in a pair of limbs 13a, 13b. *Brock*, col. 2, lines 34-49. The limbs 13a, 13b are not movable relative to each other, but rather deform with respect to the central portion 11 during assembly. Moreover, in contrast to the “arced elements” of Claim 1, the limbs 13a, 13b of Brock are not linked to each other at the ends thereof. Accordingly, for at least these reasons, Applicants submit that Darby and Brock, individually or in combination, do not teach or suggest the recited features of Claim 1.

Buckley also fails to cure the deficiencies of Darby and Brock. Buckley teaches a hydraulic cylinder 10 including a casing 12, a cylinder head 24 secured within the casing 12, and a locking ring 28. The locking ring 28 includes three ring segments 30, 32, and 34. The locking ring 28 engages concentric grooves 26 in the casing 12 to prevent the cylinder head 24 from sliding outward. *Buckley*, col. 2, line 72 to col. 3, line 4. While Buckley does teach three ring segments, these segments are not linked to each other *at all*, much less linked to each other at

their ends as specified by amended Claim 1. Accordingly, for at least these reasons, Applicants also submit that Darby and Buckley, individually or in combination, do not teach or otherwise suggest the recited features of Claim 1. Therefore, for at least these reasons, Applicants submit that Claim 1 is not obvious in view of the cited references. Claims 2-5, 10 and 11 depend from Claim 1 and, therefore, for at least the same reasons stated above with respect to Claim 1, are allowable. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

NEW CLAIMS

Applicants have added new Claims 15 and 16. Claim 15 depends from Claim 1, and, therefore, for at least the same reasons stated above with respect to Claim 1, is allowable. Claim 16 is in independent form and is also allowable for at least the reasons stated above with respect to Claim 1. Accordingly, Applicants respectfully request favorable consideration of new Claims 15 and 16.

CONCLUSION

In view of the above, Applicants respectfully request entry of this Amendment and allowance of pending Claims 1-5, 9-11, 13, and 15-16.

Respectfully submitted,



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